

FILED IN UNITED STATES DISTRICT
COURT, DISTRICT OF UTAH
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BY D. MARK JONES, CLERK
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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARIA VICTORIA LEDESMA,
AKA MARIA BROWN; FRANCISCO
ESPINOZA JR.;
JAVIER EDUARDO COLINDRES-
AVILA; and HECTOR MANUEL
INZUNZA-CORTEZ aka ARCADIO
CHAVEZ, aka FLACO,

Defendants.

Case No. 2:18mj 114-DBP

CRIMINAL COMPLAINT

VIO: CONSPIRACY TO
DISTRIBUTE
METHAMPHETAMINE
[21 U.S.C. § 846]

Magistrate Judge Dustin B. Pead

Before a United States Magistrate Judge for the District of Utah, appeared
the undersigned, who on oath deposes and says:

COUNT 1

On or about February 18, 2018, in the Central Division of the District of Utah and elsewhere,

MARIA VICTORIA LEDESMA, AKA MARIA BROWN;
FRANCISCO ESPINOZA JR.;
JAVIER EDUARDO COLINDRES-AVILA;
and
HECTOR MANUEL INZUNZA-CORTEZ aka Arcadio CHAVEZ, aka FLACO,
the Defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with each other and with other persons known and unknown, to commit the following offenses against the United States of America:

a. To distribute a controlled substance, to wit, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance within the meaning of 21 U.S.C. § 812, in violation of 21 U.S.C. § 841(a)(1),

all in violation of 21 U.S.C. § 846 and punishable under 21 U.S.C. § 841(b)(1)(A).

* * *

Complainant states that this complaint is based on information obtained through investigation consisting of the following:

I, Ron Anson, being first duly sworn, depose and say:

1. I am a Special Agent employed by the Drug Enforcement Administration. I am currently assigned to the Salt Lake City Drug Enforcement Administration (DEA) Metropolitan Narcotics Task Force and am currently assigned to Task Force Group 2 in the DEA Salt Lake City District Office (SLCDO). I have been employed as a Special Agent with the DEA since 1996 and have conducted numerous drug investigations, ranging in impact from local to international. As part of my duties at the DEA, I often respond to assist international, state, county, and local officers with investigations into drug trafficking operations and organizations. As a Special Agent I have had extensive training, which has provided me with a background and basis of knowledge relating to the investigation of drug related crimes and the enforcement of laws concerning controlled substances as found in Title 21 of the United States Code.

2. Pursuant to Orders entered by the United States District Court for the District of Utah, the DEA has been intercepting and recording calls on two phone lines used and carried by Maria Victoria Ledesma aka Maria Brown ("LEDESMA"). The phone lines are referred to here as TT-1 and TT-2.

3. On February 4, 2018, at approximately 6:43 p.m., LEDESMA, utilizing TT-1, called 385-242-**** and was recorded talking to Hector Manuel INZUNZA-Cortez, aka Arcadio CHAVEZ, aka FLACO. She told INZUNZA on

that she was at home, and directed Francisco ESPINOZA Jr. to translate for her on her end of the telephone. ESPINOZA then translated for LEDESMA, who could be heard speaking in English in the background, telling ESPINOZA what to say to INZUNZA. LEDESMA told INZUNZA, through ESPINOZA that “he could come over now if he wanted to.” INZUNZA told LEDESMA that “they could do it tomorrow,” and LEDESMA agreed. ESPINOZA then told INZUNZA that they could talk to each other when INZUNZA and ESPINOZA see each other. INZUNZA agreed. LEDESMA then told INZUNZA, through ESPINOZA, “to call RIGO, because RIGO did not have his (INZUNZA’s) number.” INZUNZA told LEDESMA, through ESPINOZA, that he had “tried to call RIGO, but he did not answer.” LEDESMA asked INZUNZA, through ESPINOZA, if she “should see if RIGO had any money for him (INZUNZA).” INZUNZA said they could do all of that the next day.

4. On February 5, 2018, the United States District Court, District of Utah, authorized a GPS location search warrant for 385-242-****, which revealed that the phone was in Los Angeles, California beginning approximately February 6, 2018.

5. On February 18, 2018, at approximately 11:08 a.m., LEDESMA received an incoming call TT-2 from 801-735-****, which was intercepted and

recorded on the wire intercept of TT-2. 801-735-**** is utilized by Javier Eduardo COLINDRES-Avila. COLINDRES told LEDESMA that INZUNZA was “on the other line, on the phone”. COLINDRES was talking to both LEDESMA and INZUNZA on the different phones. INZUNZA asked LEDESMA through COLINDRES, if he (INZUNZA) could “borrow LEDESMA’s garage to open up the car”. INZUNZA said he “couldn’t do it on the street”.

6. On February 18, 2018, at approximately 11:11 a.m., LEDESMA made an outgoing call on TT-2 to COLINDRES. COLINDRES told LEDESMA that INZUNZA “got a new car”. COLINDRES asked LEDESMA to do INZUNZA “a favor”. COLINDRES told LEDESMA that he (INZUNZA) “needs to open the car because he got a new car”. COLINDRES said further that LEDESMA needs to open her garage INZUNZA would put his car in to pull everything out. COLINDRES asked if LEDESMA could do that. LEDESMA agreed. LEDESMA also said her garage was full, and she couldn’t pull a car in. LEDESMA offered to have INZUNZA go to her “shop” and she would let INZUNZA in there. COLINDRES told LEDESMA that INZUNZA had to put the vehicle inside the garage “so that no one sees anything”. LEDESMA acknowledged, and said she would call COLINDRES back.

7. On February 18, 2018, at approximately 11:23 a.m., LEDESMA received another call on TT-2 from COLINDRES. COLINDRES asked LEDESMA what she thought. LEDESMA asked COLINDRES “if they wanted to come and do it in her garage”. COLINDRES acknowledged and said he could do that. COLINDRES said he was told by INZUNZA to do it. LEDESMA acknowledged. COLINDRES told LEDESMA that he COLINDRES could move everything, and she didn’t have to do anything. COLINDRES told LEDEMSA that INZUNZA would call her. COLINDRES told LEDESMA that he was told by INZUNZA that LEDESMA “had to do it”, and that INZUNZA was an hour away. COLINDRES told LEDESMA that INZUNZA was directing COLINDRES to clean out LEDESMA garage for her. COLINDRES asked LEDESMA if that was alright, to which LEDESMA agreed.

8. On February 18, 2018, at approximately 2:15 p.m., a red 2004 Toyota Corolla bearing a Utah license plate registered to COLINDRES at a Utah address arrived at the Sandy, Utah address of LEDESMA. COLINDRES and a female were observed getting out of the vehicle, and going into the residence. Then the home’s garage door opened and LEDESMA, COLINDRES, and other individuals from the residence began to move items from the garage.

9. On February 18, 2018, at approximately 2:30 p.m., a black Chevrolet Impala bearing a California license plate arrived at LEDESMA'S home. Officers and Agents who had the home under surveillance detained the occupants of that vehicle, and also detained the occupants of the home. The driver of the Chevrolet Impala was a female named Y.E., and the front passenger was a Hector Manuel INZUNZA-Cortez. I recognized INZUNZA-Cortez based on having seen him at LEDESMA's residence previously. The telephone 385-242-****, which was utilized by INZUNZA was later found in the black Chevrolet Impala, when I did a test call on that telephone number. INZUNZA exited the black Impala, and went to LEDESMA and COLINDRES who were at the garage of the residence. DEA Salt Lake City District Office agents and Sandy City Police Officers detained all individuals in front of the residence, and called all other occupants of the residence to come out to the front yard area.

9. A search warrant was obtained for LEDESMA'S residence, and all vehicles at the residence. Another search warrant was obtained for LEDESMA'S business, LEGENDZ barber shop at 1465 South State Street, Suite 9, Salt Lake City, Utah.

10. From the black Chevrolet Impala that was INZUNZA's vehicle, there was approximately 10 pounds of methamphetamine seized from a concealed

compartment in the engine firewall. From LEDESMA'S residence, there was seized approximately one pound of methamphetamine, approximately ¼ pound of heroin, and two semi-automatic handguns. From the LEGENDZ barber shop, DEA agents seized approximately another ½ pound of methamphetamine and approximately another ¼ pound of heroin. A field test was done on all of the drugs, and they tested positive for their suspected drugs, which were heroin and methamphetamine.

11. Post-arrest interviews were conducted on the individuals listed in this complaint after being transported to the DEA Salt Lake City District Office for processing.

12. Maria LEDESMA aka Maria BROWN was interviewed by SA Ron Anson, and TFO Christian Holmes. SA Anson advised LEDESMA of her *Miranda* rights. LEDESMA acknowledged that she understood her rights, and was willing to answer the agent's questions. LEDESMA stated that she was trafficking in methamphetamine and heroin in the Salt Lake City area. She stated that the drugs (methamphetamine and heroin) found at her residence and one of the handguns at her residence was hers. She stated that in the past month she has received approximately 5 pounds of methamphetamine from INZUNZA, and that he was her source of supply for methamphetamine. She also stated that she knew

that on that day, she told INZUNZA and COLINDRES that they could remove the load of illegal drugs, which she thought would be methamphetamine, from INZUNZA's vehicle in her garage, and they were removing items from her garage to make room for the load car, when they were detained by the agents and officers.

9. Hector Manuel INZUNZA-Cortez was interviewed by SA Anson, and TFO Chris Williamson. SA Anson advised INZUNZA of his *Miranda* rights in Spanish. INZUNZA acknowledged that he understood his rights, and was willing to answer the agent's questions. INZUNZA stated that he had loaded the black Chevrolet Impala that he was riding in with 10 pounds of methamphetamine, and that he was coming to sell the methamphetamine in the Salt Lake City area. He stated that he purchased the methamphetamine in Los Angeles, California for \$2,500.00 per pound. He says that he traffics methamphetamine with LEDESMA.

10. Javier Eduardo COLINDRES-Avila was interviewed by SA Anson and TFO Williamson. SA Anson advised COLINDRES of his *Miranda* rights in Spanish. COLINDRES acknowledged that he understood his rights, and was willing to answer the agent's questions. COLINDRES stated that he translated Spanish to English for INZUNZA and LEDESMA, and knew that they were discussing drug trafficking, but did not know how much illegal drugs were coming in INZUNZA's vehicle, or the type of drugs it would be. COLINDRES stated that he knew they

had to put the drug transportation vehicle in the garage to get the illegal drugs out of the compartment. COLINDRES worked for LEDESMA at LEDGENDZ barber shop, and helped her translate English to Spanish with her drug co-conspirators.

11. Francisco ESPINOZA, Jr. was interviewed by SA Anson and TFO Williamson. SA Anson advised ESPINOZA of his *Miranda* rights in English. ESPINOZA acknowledged that he understood his rights, but was not willing to answer any of his questions. ESPINOZA then asked the agents why was being arrested. SA Anson explained that there were intercepted telephone calls where ESPINOZA was translating English to Spanish for LEDESMA and INUZNZA regarding their drug trafficking. ESPINOZA then stated that he felt it wasn't right that he should be arrested for doing some translations.


12. On February 8, 2018, at approximately 2:57 p.m., LEDESMA made a call on TT-2 to 801-806-****, which is utilized by ESPINOZA. LEDESMA told ESPINOZA to ask MICHAEL LNU if he had a "step". ESPINOZA told LEDESMA that MICHAEL had already left. LEDESMA asked if MICHAEL was

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getting a haircut. ESPINOZA told LEDESMA that he (MICHAEL) “just wanted some, you know.”



RON ANSON
Special Agent
Drug Enforcement Administration

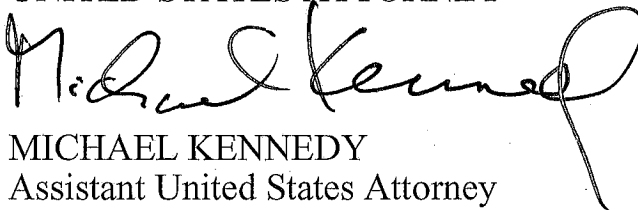
SUBSCRIBED AND SWORN TO BEFORE ME this 20th day of
February, 2018.



DUSTIN B. HEAD
United States Magistrate Judge

APPROVED:

JOHN W. HUBER
UNITED STATES ATTORNEY



MICHAEL KENNEDY
Assistant United States Attorney